

FILED

FEB - 3 2021

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D'ANTE CARTER,

Defendant.

4:21CR74 SEP/SPM

INDICTMENT

**COUNT ONE
(Conspiracy)**

The Grand Jury charges that:

1. From on or about December 4, 2019, until September 24, 2020, in the Eastern District of Missouri and elsewhere,

D'ANTE CARTER,

the Defendant herein, did knowingly combine, confederate, conspire, and agree, together with a known individual, to unlawfully transport and sell stolen goods in interstate commerce, in violation of Title 18, United States Code, Section 2315.

OBJECT OF THE CONSPIRACY

2. The object of the conspiracy was to steal catalytic converters from motor vehicles in the State of Missouri and transport them to the State of Illinois for sale.

MANNER AND MEANS OF THE CONSPIRACY

3. The means and methods by which the conspiracy was sought to be accomplished included, among others, the following:

- a. The participants would travel during nighttime hours to locate motor vehicles in the St. Louis, Missouri area from which to steal catalytic converters.
- b. The participants would usually concentrate their search on business properties and would usually select trucks and vans rather than cars from which to steal catalytic converters.
- c. The participants, having targeted a motor vehicle, would cut its catalytic converter off by use of a reciprocating saw.
- d. The participants, having stolen several catalytic converters in this manner, would transport them into the State of Illinois.
- e. The participants, having transported the stolen catalytic converters into the State of Illinois, would sell them to a recycling company.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the object of the conspiracy, the conspirators committed and caused the following overt acts:
 - a. On or about January 11, 2020, at the 1100 block of Corporate Lake Drive, Creve Coeur, Missouri, the participants stole a catalytic converter from a Ford passenger van belonging to Life Bridge Partnership.
 - b. On or about January 19, 2020, at the 1100 block of Corporate Lake Drive, Creve Coeur, Missouri, the participants stole 3 catalytic converters from 3 Ford passenger vans belonging to Life Bridge Partnership.
 - c. On or about January 27, 2020, at the 1100 block of Corporate Lake Drive, Creve Coeur, Missouri, the participants stole a catalytic converter from a Ford passenger van belonging to Life Bridge Partnership.

d. On or about August 22, 2020, at the 10600 block of Midland Boulevard, St. Louis County, Missouri, the participants stole 5 catalytic converters from 5 heavy duty Ford pickup trucks belonging to West County Gardens.

e. On or about August 22, 2020, the participants sold 10 catalytic converters for \$4,791.00 to Apex Recycling in Fairmont City, Illinois.

f. On or about August 31, 2020, at the 1000 block of N. Lindbergh, St. Louis County, Missouri, the participants stole 6 catalytic converters from 6 heavy duty Ford pickup trucks belonging to O'Hara Landscape and Lawn Care.

g. On or about August 31, 2020, at the 2800 block of Breckenridge Industrial Court, Webster Groves, Missouri, the participants stole 3 catalytic converters from 3 heavy duty Ford pickup trucks belonging to Timberline Landscapes.

h. On or about August 31, 2020, the participants sold 9 catalytic converters for \$4,375.00 to Apex Recycling in Fairmont City, Illinois.

i. On or about September 2, 2020, at the 11000 block of Warner Drive, Maryland Heights, Missouri, the participants stole 6 catalytic converters from 6 heavy duty Ford pickup trucks, and attempted to steal 3 catalytic converters from 3 heavy duty Ford pickup trucks, belonging to Mid American Lawn.

j. On or about September 2, 2020, at the 2400 block of Schuetz Road, Maryland Heights, Missouri, the participants stole a catalytic converter from a heavy duty Ford pickup truck belonging to Renewal by Anderson.

k. On or about September 2, 2020, the participants sold 9 catalytic converters for \$2,898.00 to Apex Recycling in Fairmont City, Illinois.

l. On or about September 11, 2020, at the 3700 block of West Clay Street, St. Charles, Missouri, the participants stole 4 catalytic converters from a Mazda 6, a Honda CRV, a Toyota Prius, and a heavy duty Ford pickup truck belonging to the Car Store.

m. On or about September 11, 2020, the participants sold 6 catalytic converters for \$764.00 to Apex Recycling in Fairmont City, Illinois.

n. On or about September 16, 2020, at the 11900 block of Dorsett Road, Maryland Heights, Missouri, the participants stole 9 catalytic converters from 9 heavy duty Ford pickup trucks belonging to Brightview Landscaping.

All in violation, and punishable under, Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Upon conviction of Title 18, United States Code, Section 371 (Title 18, United States Code, Section 2315), Conspiring to Transport and Sell Stolen Goods in Interstate Commerce as charged in Count One, pursuant to Title 18, United States Code, Section 981(a) and Title 28, United States Code, Section 2461(c), the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said offense and property used to facilitate said offense.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

3. Specific property subject to forfeiture includes, but is not limited to, the following:

a. A minimum of \$71,504 in United States currency, and all interest and proceeds traceable thereto, in that such sum in the aggregate constitutes proceeds the defendant obtained, directly or indirectly, as a result of the crime charged in Count One.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

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